

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR ELECTRIC, D.T.E. 03-121

**FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
THE NEW ENGLAND DISTRIBUTED GENERATION COALITION**

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to the New England Distributed Generation Coalition the following information requests with respect to the above captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to the Solar Energy Business Association of New England in this proceeding.

1. "NEDGC@ means the New England Distributed Distribution Coalition, its members, employees, consultants, and attorneys.
2. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number(for example, DTE-NEDGC-1-1), the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
3. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
4. These requests shall be deemed continuing so as to require further supplemental responses if NEDGC or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
5. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche,

computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If NEDGC finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) John Cope-Flanagan, Legal Division; (3) Jeff Hall, Rates and Revenue Requirements Division; (4) Claude Francisco, Rates and Revenue Requirements Division; (5) Sean Hanley, Rates and Revenue Requirements Division; and (6) Xuan Yu, Rates and Revenue Requirements Division.

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THE NEW ENGLAND DISTRIBUTED GENERATION COALITION**

**Information Requests**

**Information Requests Related to the Pre-filed Testimony of Thomas W. Smith**

- DTE-NEDGC-1-1      Refer to the Direct Testimony of Thomas W. Smith at 7, lines 16-19. Please provide concrete examples of situations in which Equity Office Properties (ÆOP®) with CHP would pay more than an EOP property without CHP under the proposed NSTAR Electric standby rates.
- DTE-NEDGC-1-2      Refer to the Direct Testimony of Thomas W. Smith at 9, lines 17-19. Please elaborate on the Ameasurement and consideration of benefits conferred by CHP to the distribution system®. Specifically, address the issue of quantifying any benefits in such a way that they can be incorporated into a standby rate tariff.
- DTE-NEDGC-1-3      Refer to the Direct Testimony of Thomas W. Smith at 10, lines 14-15. What would be an appropriate notification period to cancel service? Please explain the rationale for your response.
- DTE-NEDGC-1-4      Refer to the Direct Testimony of Thomas W. Smith at 10, lines 17-18. What would be the appropriate notification period for transferring to non-firm standby service? Please explain the rationale for your response.
- DTE-NEDGC-1-5      In reference to the pre-filed testimony of Thomas W. Smith at 2, line 16, please indicate the number of EOP buildings by city in Massachusetts that could potentially benefit from the combined heat and power strategy.
- DTE-NEDGC-1-6      In reference to the pre-filed testimony of Thomas W. Smith at 2, lines 18-20, for each of the 24 projects identified, please list those projects located in Massachusetts and indicate for each project the kW rating, project cost, and the projected percentages of the customer-s electrical

load and thermal requirement that will be supplied by the project.

**Information Requests Related to the Pre-filed Testimony of Sean Casten**

- DTE-NEDGC-1-7 Refer to the Direct Testimony of Sean Casten at 6, lines 16-17. Please explain how the benefits of DG should be incorporated into the standby rates proposed by NSTAR Electric. Please be specific regarding the monetary valuation of such benefits.
- DTE-NEDGC-1-8 In reference to the pre-filed testimony of Sean Casten at 4, lines 15-17, please list and describe all the projects undertaken by Turbosteam Corporation in Massachusetts where ~~A~~the coupling of a steam turbine to a mechanical drive that displaces an electric motor load~~@~~was supported through DSM funds. Indicate the total cost of each project and the amount of DSM funds provided.
- DTE-NEDGC-1-9 In reference to the pre-filed testimony of Sean Casten at 6-7, please provide any study to support the claim that: ~~A~~. . . our generators are 3 times as efficient as the central power grid . . . .~~@~~
- DTE-NEDGC-1-10 In reference to the pre-filed testimony of Sean Casten at 9, lines 13-14, please provide any study to support the statement that: ~~A~~We found that the NSTAR rate has the least negative impact on DG systems that are base-loaded and to systems that peak during the winter months.~~@~~

Dated: March 26, 2004